

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION**

CIVIL ACTION NO. \_\_\_\_\_

<p><b>Jane Doe,</b></p>	<p>)</p>	
<p><b>Plaintiff</b></p>	<p>)</p>	
<p><b>v.</b></p>	<p>)</p>	
	<p>)</p>	<p><b>PLAINTIFF’S MOTION TO FILE</b></p>
	<p>)</p>	<p><b>COMPLAINT UNDER SEAL AND</b></p>
<p><b>Gerald Fournier, as Superintendent of</b></p>	<p>)</p>	<p><b>PROCEED UNDER A</b></p>
<p><b>Palmer Public Schools, Town of Palmer,</b></p>	<p>)</p>	<p><b>PSEUDONYM</b></p>
<p><b>Town of Palmer School Committee,</b></p>	<p>)</p>	
<p><b>Gary A. Blanchette as a Member of the</b></p>	<p>)</p>	
<p><b>Town of Palmer School Committee,</b></p>	<p>)</p>	
<p><b>Mary A. Salzmman, as a Member of the</b></p>	<p>)</p>	
<p><b>Town of Palmer School Committee,</b></p>	<p>)</p>	
<p><b>David M. Lynch, as a Member of the</b></p>	<p>)</p>	
<p><b>Town of Palmer School Committee,</b></p>	<p>)</p>	
<p><b>James St. Amand, as a Member of the</b></p>	<p>)</p>	
<p><b>Town of Palmer School Committee,</b></p>	<p>)</p>	
<p><b>Robert Janasiewicz, as a Member of the</b></p>	<p>)</p>	
<p><b>Town of Palmer School Committee,</b></p>	<p>)</p>	
<p><b>Maureen R. Gallagher, as a Member of</b></p>	<p>)</p>	
<p><b>the Town of Palmer School Committee,</b></p>	<p>)</p>	
<p><b>Bonny Rathbone, as Former Principal of</b></p>	<p>)</p>	
<p><b>Palmer High School and Patrick Van</b></p>	<p>)</p>	
<p><b>Amburgh,</b></p>	<p>)</p>	
<p><b>Defendants</b></p>	<p>)</p>	

The plaintiff, Jane Doe, hereby respectfully moves to file her complaint under seal and proceed under a pseudonym. Grounds for this motion are that the case involves allegations that the plaintiff was taken advantage of sexually by her high school guidance counselor when she was a minor student at Palmer High School. Additional and more detailed grounds for this motion are set forth in Plaintiff’s Memorandum in Support of Plaintiff’s Motion to File Complaint Under Seal and Proceed Under a Pseudonym filed simultaneously with the present motion.

The Plaintiff,  
JANE DOE  
By Her Attorneys:

Dated: June 3, 2011

/s/ Jeffrey E. Poindexter  
Jeffrey E. Poindexter – BBO #631922  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document was served on counsel for the defendants who represented the defendants via first class mail to counsel for Patrick Van Amburgh and via hand delivery to counsel for the other defendants.

/s/ Jeffrey E. Poindexter  
Jeffrey E. Poindexter

**LOCAL RULE 7.1(a)(2) CERTIFICATION**

I hereby certify, pursuant to Local Rule 7.1(a)(2), that after having met and conferred in good faith with the defendants, the parties were unable to resolve or narrow the issues pertaining to this motion. However, counsel for the defendants have indicated that they would confer with their clients as to whether they will oppose the motion. The undersigned counsel expects that any parties who do not oppose the motion will file notice of the same.

/s/ Jeffrey E. Poindexter  
Jeffrey E. Poindexter